

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
(Greenbelt)**

In re:	*
	*
Clifford Cornelius Wong and Adebessi	*
Charles Wong	Case No. 15-19543
	*
Debtors	*
	*
*****	*****

**RES-FL FOUR, LLC'S OBJECTION TO CONFIRMATION
OF DEBTORS' THIRD AMENDED CHAPTER 13 PLAN**

RES-FL FOUR, LLC (the “Noteholder”), by its undersigned counsel and pursuant to 11 U.S.C. § 1325, objects to the confirmation of Clifford Cornelius Wong and Adebessi Charles Wong’s (together, the “Debtors”) Third Amended Chapter 13 Plan [Dkt. 48] (the “4th Plan”) as follows:

1. The Noteholder is the largest unsecured creditor of the Debtors’ estate and previously filed an objection [Dkt. 45] (the “Initial Objection”) to the confirmation of the Debtor’s Second Amended Plan of Reorganization.
2. The 4th Plan suffers from the same infirmities as the Second Amended Plan.¹ Therefore the Noteholder incorporates by reference its Initial Objection as a continuing objection to the confirmation of the 4th Plan.
3. In addition, the Noteholder filed a Motion to Dismiss the Debtors’ Case with Prejudice [Dkt. 49] (the “Motion to Dismiss”) on August 9, 2016. By way of its Motion to Dismiss, the Noteholder argues that, *inter alia*, the Debtors’ bankruptcy case should be dismissed because the 4th Plan is not proposed in “good faith” as required by Section 1325(a)(3) of the Bankruptcy Code. The Noteholder incorporates by reference all of those arguments set forth in its Motion to Dismiss as objections to the confirmation of the 4th Plan.

¹ And the plan before that, and the plan before that....

4. The Noteholder reserves its right to submit further objection to the confirmation of the 4th Plan

WHEREFORE, RES-FL FOUR, LLC respectfully requests that the Court enter an Order denying confirmation of the Debtors' Third Amended Chapter 13 Plan, dismissing this bankruptcy case with prejudice, and granting such further relief as is just and appropriate.

Respectfully submitted,

Dated: August 12, 2016

s/ Joshua D. Bradley
Joshua D. Bradley (ID 28821)
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Attorneys for RES-FL FOUR, LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY, that on this 12th day of August 2016, a copy of the foregoing
Objection to Confirmation of Debtors' Chapter 13 Plan, was served on the following persons, via
ECF and/or first class U.S. mail, postage prepaid.

US Trustee
US Trustee – Greenbelt
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/s/ Joshua D. Bradley
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ND: 4838-2650-9878, v. 1